



1 Jason C. Doolen  
2 6665 Secluded Ave.  
3 Las Vegas, Nv. 89110  
4 702 526-4128

5 **IN THE UNITED STATES DISTRICT COURT**  
6  
7 **SOUTHERN DISTRICT OF NEVADA**

8 Jason C. Doolen

9 Plaintiff,

10 vs,

2:14-cv-00716-JCM-VCF

11 Bank of America

12 Defendant.

13 **COMPLAINT**

14  
15  
16 **PRELIMINARY STATEMENT**

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18 1. This is an action for damages brought from violations of the Fair Credit Reporting Act  
19 (FCRA) 15 U.S.C. §1681 *et seq.*  
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21 **JURISDICTION**

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23 2. The jurisdiction of this Court is conferred by 15 U.S.C. §1681p.  
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25 **FACTUAL ALLEGATIONS**  
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1 2. On December 6th and 27th, 2013, Defendant initiated a soft pull of Plaintiff's credit  
2 report from Equifax and TransUnion without permissible purpose.  
3  
4

5 **COUNT I**

6 **VIOLATION OF FAIR CREDIT REPORTING ACT (FCRA), 15 U.S.C. §1681**  
7  
8 **WILLFUL NON-COMPLIANCE BY DEFENDANT**

9 3. Plaintiff is a consumer within the meaning of the FCRA, 15 U.S.C. §1681a(c).

10 4. Defendant is a furnisher of information within the meaning of the  
11 FCRA, 15 U.S.C. §1681s-2.  
12

13 5. Defendant willfully violated the FCRA. Defendant's violations  
14 include, but are not limited to, the following:

15 (a) Defendant willfully violated 15 U.S.C. §1681b(f) by obtaining  
16 Plaintiff's consumer report without a permissible purpose as defined by 15 U.S.C. §1681b.  
17

18 **WHEREFORE**, Plaintiff demands judgment for damages in the amount of \$2,000 against  
19 Bank of America for statutory damages, attorney's fees and costs, pursuant to 15 U.S.C.  
20 §1681n.  
21  
22  
23

24 **COUNT II**

25 **VIOLATION OF FAIR CREDIT REPORTING ACT (FCRA), 15 U.S.C. §1681**  
26  
27 **NEGLIGENT NON-COMPLIANCE BY DEFENDANT**  
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1 6. Plaintiff is a consumer within the meaning of the FCRA, 15 U.S.C. §1681a(c).

2 7. Defendant is a furnisher of information within the meaning of the  
3 FCRA, 15 U.S.C. §1681s-2.  
4

5 8. Defendant negligently violated the FCRA. Defendant's violations  
6 include, but are not limited to, the following:

7 (a) Defendant negligently violated 15 U.S.C. §1681b(f)  
8 by obtaining Plaintiff's consumer report without a permissible purpose as defined  
9 by 15 U.S.C. §1681b.  
10

11  
12 **WHEREFORE**, Plaintiff demands judgment for damages in the amount of \$2,000 against  
13 Bank of America for statutory damages, and attorney's fees and costs,  
14 pursuant to 15 U.S.C. § 1681o.  
15

16  
17 **DEMAND FOR JURY TRIAL**

18 Plaintiff hereby demands a trial by jury of all issues so triable as a matter of law.  
19

20 Respectfully submitted this 7<sup>th</sup> day of May, 2014

21 

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